

EXHIBIT 121
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10018-JSR

DEUTSCHE BANK AKTEINGESELLSCHAFT, et al.,
Defendants.

- - - - - x

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Civil Action No.

-against-

1:22-cv-10019-JSR

JP MORGAN CHASE BANK, N.A.

Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of PAUL
MORRIS, taken pursuant to subpoena, was
held REMOTELY, commencing April 18,
2023, 9:00 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

MAGNA LEGAL SERVICES
(866) 624-6221

1 P. Morris - Confidential

2 and questions about that. And I recall our 19:14:44

3 CEO spoke to Epstein and, you know, got 19:14:52

4 answers on that. 19:14:58

5 Q. Do you remember what Jeffrey 19:15:00

6 Epstein's answers were for the cash 19:15:01

7 withdrawals in 2012 from Hyperion Air? 19:15:05

8 A. I believe they were for -- his 19:15:11

9 answer was they were for fuel. 19:15:16

10 Q. Did you ever attempt to determine 19:15:18

11 whether the cash was actually used for the 19:15:22

12 payment of fuel? 19:15:31

13 MR. BOUCHOUX: Objection to form. 19:15:36

14 A. I did not. 19:15:38

15 Q. Did it ever concern you that 19:15:41

16 perhaps the cash was being withdrawn for the 19:15:47

17 payment related to sexual abuse or sex 19:15:51

18 trafficking? 19:15:55

19 MR. BOUCHOUX: Objection to form. 19:15:56

20 A. It never occurred to me that that's 19:16:00

21 what was happening. 19:16:02

22 Q. To your knowledge, did anyone 19:16:05

23 around you at JP Morgan ever indicate that 19:16:07

24 they suspected that the cash withdrawals were 19:16:11

25 being used or could be used for sexual abuse 19:16:17

1 P. Morris - Confidential

2 or sex trafficking? 19:16:20

3 MR. BOUCHOUX: Objection to form. 19:16:23

4 A. Absolutely not, never heard that. 19:16:25

5 Q. Same question at Deutsche Bank, did 19:16:28

6 anyone around you ever suggest that the cash 19:16:34

7 withdrawal activity from Jeffrey Epstein's 19:16:39

8 accounts was potentially being used by him to 19:16:42

9 sexually abuse or sex traffic? 19:16:48

10 A. Absolutely not, I never heard that. 19:16:52

11 Q. Do you recall from time to time at 19:17:01

12 JP Morgan being sent negative news articles 19:17:04

13 about Jeffrey Epstein connected to human 19:17:07

14 trafficking? 19:17:09

15 MS. BEBCHICK: Objection. 19:17:12

16 A. I recall getting the negative news 19:17:15

17 stories from time to time, but I don't recall 19:17:20

18 them being about trafficking. 19:17:24

19 Q. Did you ever speak with Steven 19:17:47

20 Cutler about Jeffrey Epstein? 19:17:51

21 A. No, never spoke to him. 19:17:52

22 Q. Did you ever attend any rapid 19:18:02

23 response meeting that was called as a 19:18:06

24 consequence of any negative news articles 19:18:08

25 related to Jeffrey Epstein? 19:18:12